

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

BASF CORPORATION, as successor in interest to CIBA CORPORATION,	
Plaintiff,	
v.	
AIU INSURANCE COMPANY, ALLIANZ GLOBAL RISKS US INSURANCE COMPANY, ALLIANZ VERSICHERUNGS-AG, ALLSTATE INSURANCE COMPANY, AXA GROUP AG, AXA INSURANCE COMPANY, EMPLOYERS MUTUAL CASUALTY COMPANY, FIRST STATE INSURANCE COMPANY, GRANITE STATE INSURANCE COMPANY, HDI GLOBAL INSURANCE COMPANY, HDI GLOBAL SE, INSCO LTD., INSURANCE COMPANY OF NORTH AMERICA, INSURANCE COMPANY OF THE STATE OF PENNSYLVANIA, INTERSTATE FIRE & CASUALTY COMPANY, NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA, NEW ENGLAND INSURANCE COMPANY, RSA INSURANCE GROUP LIMITED, TIG INSURANCE COMPANY, TRAVELERS CASUALTY & SURETY COMPANY, TWIN CITY FIRE INSURANCE COMPANY WESTPORT INSURANCE CORPORATION and ZURICH INSURANCE GROUP LTD.,	Civil Action No. 2:24-cv-993-RMG
Defendants.	

SCHEDULING ORDER

Plaintiff BASF Corporation, as successor in interest to CIBA Corporation (“BASF”) and the AIG Insurer Defendants¹ (collectively, the “Lead Parties”) respectfully submit this Joint Proposed Scheduling Order and agree and request that the Court order as set forth below:

1. All Defendants shall respond to the Amended Complaint by June 28, 2024.
2. If any Defendant moves to dismiss the Amended Complaint, Plaintiff must file any

opposition brief by July 26, 2024, and Defendants must file any reply brief by August 9, 2024.

May 30, 2024

COLLINS & LACY, P.C.

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Counsel for BASF Corporation

¹ Defendants AIU Insurance Company, Granite State Insurance Company, Insurance Company of the State of Pennsylvania, and National Union Fire Insurance Company of Pittsburgh, Pa.

SO ORDERED this 7th day of June, 2024:

s/Richard M. Gergel
Hon. Richard M. Gergel